

UNITED STATES DISTRICT COURT

for the

Western District of North Carolina

United States of America)

v.)

Stephen Roger Dean)

Defendant(s)

Case No. 3:15-mj-89

FILED
CHARLOTTE, NC
FEB 27 2015
U.S. DISTRICT COURT
WESTERN DISTRICT OF NC

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 2014 through August 2014 in the county of Caldwell in the
Western District of North Carolina, the defendant(s) violated:

Code Section

21 U.S.C. 841(a), 841(b)(1)(A), 846

Offense Description

Conspiracy to possess with intent to distribute at least five hundred (500) grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

This criminal complaint is based on these facts:


☒ Continued on the attached sheet.


 Complainant's signature

Joseph B. Barringer, HSI Special Agent
 Printed name and title

Sworn to before me and signed in my presence.

Date: 02/27/2015


 Judge's signature

City and state: Charlotte, North Carolina

U.S. Magistrate Judge David S. Cayer
 Printed name and title

ATTACHMENT A:
Affidavit in Support of Criminal Complaint and Arrest Warrant
for Stephen Roger DEAN

I, Joseph B. Barringer, Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (HSI), being duly sworn and deposed, state as follows:

BACKGROUND/INTRODUCTION

1. Your Affiant is an investigator or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered to conduct investigations of, and to make arrests for, the offenses enumerated in Title 8, 18, 19, 21, 31 United States Code and other related offenses. I was previously employed as a criminal investigator with the North Carolina Department of Crime Control and Public Safety, Alcohol Law Enforcement Division, for three years. I have been employed as a Special Agent with Homeland Security Investigations (HSI) and its predecessor agency, Immigration and Customs Enforcement, since December 14, 2003, during which time I have completed the Criminal Investigator Training Program and the Immigration and Customs Enforcement, Special Agent Training programs at the Federal Law Enforcement Training Center.

2. I am currently assigned to a Narcotics and Bulk Cash Smuggling Group in the Charlotte, North Carolina HSI office and have conducted investigations focusing on international narcotics trafficking involving the unlawful importation, transportation, and distribution of controlled substances and related money laundering activities. Through investigations and training, I have become familiar with the methods and schemes employed by narcotics dealers to obtain, smuggle and distribute illegal narcotics. I have also become familiar with and utilized a

wide variety of investigative techniques, including the use of pen registers, trap and trace devices, and wire communications intercepts. I am currently one of the assigned case agents of the investigation referred to in this Affidavit, which is comprised of representatives from HSI and various other state, county, and city police agencies.

3. As a result of my personal participation in the investigation of matters referred to in this Affidavit, and based upon reports made to me by other law enforcement officials, I am familiar with the facts and circumstances of this investigation. The information contained in this Affidavit is provided for the limited purpose of establishing probable cause in support of a criminal complaint and arrest warrant for Defendant **Stephen Roger DEAN**; therefore, I have not included each and every fact known to me concerning this investigation.

SYNOPSIS OF INVESTIGATION

4. From in or about July 2014 to in or about August 2014, in Caldwell County, within the Western District of North Carolina, and elsewhere, the Defendant, Stephen Roger DEAN, was involved in a conspiracy – that is, a criminal agreement with others – to distribute and to possess with intent to distribute methamphetamine.

5. On August 14, 2014, a confidential informant debriefed about Defendant DEAN and then, under law enforcement supervision, arranged to make a controlled purchase of methamphetamine from Dean. After the controlled purchase of one pound (455 grams) of methamphetamine was completed, law enforcement stopped Defendant DEAN and provided him with his *Miranda* warnings. DEAN waived his rights and agreed to provide a statement. He told law enforcement that he had an additional two pounds of methamphetamine in his house, which they seized. (The expert forensic chemist who analyzed a sample of the methamphetamine found that 221 grams of the substance was 87.8% pure, and 172 grams of the substance was

94.3% pure.) Defendant DEAN then placed consensually recorded calls, under law enforcement supervision, to his source of supply.

6. The amount of methamphetamine (actual) that was known to or reasonably foreseeable to Defendant DEAN was at least five hundred (500) grams but less than one thousand five hundred (1,500) grams.

7. Defendant DEAN has signed a plea agreement in this Federal case, but is in North Carolina State custody, so this complaint will enable him to be brought to Federal court on a writ.

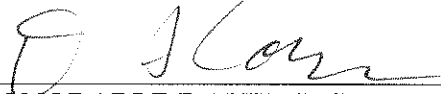
CONCLUSION

Based upon training, experience, and the facts of this investigation, I submit that there is probable cause for a criminal complaint against, and arrest warrant for, Defendant **Stephen Roger Dean**, for conspiracy to distribute and to possess with intent to distribute at least five hundred (500) grams of a mixture and substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 846, 841(a), and 841(b)(1)(A); therefore, I request that the Court issue the same.


AFFIANT, SPECIAL AGENT JOSEPH B. BARRINGER
HOMELAND SECURITY INVESTIGATIONS

AUSA Steven R. Kaufman has reviewed this Affidavit.

Subscribed and sworn to by me this 27th day of February 2015.

A handwritten signature in black ink, appearing to read "D. S. Cayer", is written over a horizontal line.

THE HONORABLE DAVID S. CAYER
UNITED STATES MAGISTRATE JUDGE